

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:))))))
		Chapter 11				
)					
DIAMOND SPORTS GROUP, LLC, <i>et al.</i> , ¹)	Case No. 23-90116	(CML)			
)					
Debtors.)	(Joint Administration Requested)				
)					

**VERIFIED STATEMENT OF THE AD HOC CROSSHOLDER GROUP
PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession (the “Debtors”), Paul Hastings LLP (“Paul Hastings” or “Counsel”) hereby submits this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with Paul Hastings’ representation of an ad hoc group (the “Ad Hoc Crossholder Group”) of holders, or investment advisors, sub-advisors, or managers of discretionary accounts that hold (i) loans (the “First Lien Term Loans”) outstanding under that certain First Lien Credit Agreement dated as of March 1, 2022 among Diamond Sports Intermediate Holdings LLC (“Holdings”), Diamond Sports Group, LLC (“Borrower”), the lenders party thereto and Wilmington Savings Fund Society, FSB (“WSFS”), as administrative agent and collateral agent (as amended, supplemented, amended and restated or otherwise modified from time to time); (ii) loans (the “Second Lien Term Loans”) outstanding under that certain Second Lien Credit Agreement dated as of March 1, 2022 among Holdings, Borrower, the lenders party thereto, WSFS, as term facility agent and collateral agent

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors’ service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

and JPMorgan Chase Bank, N.A., as revolving credit facility agent (as amended, supplemented, amended and restated or otherwise modified from time to time); (iii) 5.375% Senior Secured Second Lien Notes due 2026 (the “Second Lien Notes”) issued pursuant to that certain Indenture dated as of March 1, 2022, among Borrower and Diamond Sports Finance Company (collectively, “Issuers”) and U.S. Bank Trust Company, National Association (“U.S. Bank”), as trustee and notes collateral agent (as amended, supplemented, amended and restated or otherwise modified from time to time); and/or (iv) 6.625% Senior Notes due 2027 (the “Unsecured Notes”) issued pursuant to that certain Indenture dated as of August 2, 2019, among the Issuers and U.S. Bank, as trustee (as amended, supplemented, amended and restated or otherwise modified from time to time).

1. On or around October 4, 2022, the Ad Hoc Crossholder Group retained Paul Hastings as counsel in connection with a potential restructuring of the Debtors. Each member of the Ad Hoc Crossholder Group has consented to Counsel’s representation.

2. The members of the Ad Hoc Crossholder Group are either the beneficial holders of, or the investment advisors or managers to, funds and/or accounts that hold disclosable economic interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, attached hereto as Exhibit A is a list of the names and addresses for each member of the Ad Hoc Crossholder Group, the amount of the disclosable economic interests held by each member of the Ad Hoc Crossholder Group, as of March 20, 2023 (as certified to Counsel by each member of the Ad Hoc Crossholder Group). The information contained in Exhibit A is based upon information provided by the members of the Ad Hoc Crossholder Group to Counsel and is subject to change.

3. As of the date of this Verified Statement, Counsel represents only the members of the Ad Hoc Crossholder Group and does not represent or purport to represent any persons or entities other than the Ad Hoc Crossholder Group in connection with the Chapter 11 Cases. In

addition, as of the date of this Verified Statement, the Ad Hoc Crossholder Group does not, either collectively or through its individual members, represent or purport to represent any other persons or entities in connection with the Chapter 11 Cases.

4. The information contained in this Verified Statement and **Exhibit A** attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any member of the Ad Hoc Crossholder Group, including, without limitation, the right to assert, file and/or amend its claims in accordance with any applicable orders entered in these Chapter 11 Cases.

5. The information contained in **Exhibit A** is based upon information provided by the applicable members of the Ad Hoc Crossholder Group. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests in the Debtors, except for claims for services rendered to the Ad Hoc Crossholder Group. The Ad Hoc Crossholder Group, through Counsel, reserves the right to amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

Dated: March 20, 2023
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan

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Counsel to the Ad Hoc Crossholder Group

Certificate of Service

I certify that on March 20, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ James T. Grogan
James T. Grogan III

Exhibit A²

Entity	Address	Nature and Principal Amount of Debt Holdings
DISCOVERY GLOBAL OPPORTUNITY MASTER FUND, LTD.	20 Marshall Street South Norwalk, CT 06854	Second Lien Notes: \$105,500,000.00 Unsecured Notes: \$131,000,000.00
Funds managed by Hein Park Capital Management LP	c/o Hein Park Capital Management 888 7th Ave, 41st Fl New York, NY 10019	Second Lien Term Loans: \$54,746,827.75 Second Lien Notes: \$136,399,000.00 Unsecured Notes: \$164,235,000.00
PGIM, Inc., on behalf of various funds and/or accounts, as investment advisor, subadvisor, and/or collateral manager	PGIM, Inc. P.O. Box 32339 Newark, NJ 07102	First Lien Term Loans: \$96,248,011.58 Second Lien Term Loans: \$522,345,352.84 Second Lien Notes: \$646,126,000.00 Unsecured Notes: \$567,064,000.00

² Amounts listed on this **Exhibit A** represent the aggregate principal amount of the relevant obligations held by, or held by funds or accounts managed or advised by, the listed entities or their respective affiliates solely to the extent such entities are members of the Ad Hoc Crossholder Group. Amounts listed on this **Exhibit A** do not include any claims for, without limitation, accrued and unpaid interest (including interest accruing after the commencement of the Chapter 11 Cases), fees, expenses, premiums, make-wholes, indemnification or other amounts that may be owing under any indenture, credit agreement or other instrument.